

Exhibit 1

SUPERIOR COURT OF THE STATE OF NEW JERSEY
BERGEN COUNTY

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MOHAMED A. SAAD,	:	CASE NO. BER-L-005416-21
Plaintiff,	:	
	:	
- against -	:	SUMMONS
	:	
MIDLAND CREDIT MANAGEMENT, INC.,	:	
Defendant.	:	
----- X		
To the above-named Defendants:		

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within thirty-five (35) days after the service of this summons, exclusive of the day of service; and in case of your failure to appear or answer, judgment will be taken against you by default for the relief as demanded in the complaint. The nature of this action is negligence. The relief sought is damages. Upon your failure to appear, judgment will be taken against you by default together with the costs of this action.

Dated: August 13th, 2021

/s/ Daniel Zemel
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Attorneys for Plaintiff

MOHAMED A. SAAD,

Plaintiff,

vs.

MIDLAND CREDIT MANAGEMENT, INC.,

Defendant.

) SUPERIOR COURT OF NEW JERSEY

) BERGEN COUNTY

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Case No:

CIVIL COMPLAINT

Plaintiff, Mohamed Saad (hereinafter "Plaintiff") alleges:

PRELIMINARY STATEMENT

1. This is an action for damages arising from Defendant's violations of the Fair Debt Collections Practices Act, 15 U.S.C. §1692 *et seq.* (hereinafter "FDCPA").

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331.
3. Venue is proper in this district under 28 U.S.C § 1191(b).

PARTIES

4. Plaintiff is a natural person who at all relevant times has resided in Fairview, New Jersey, and is a "consumer" as the phrase is defined under 15 U.S.C. §1692(a) of the FDCPA.

5. Defendant Midland Credit Management, Inc. (“MCM” or “Defendant”), is a corporation that regularly conducts business in New Jersey. Defendant is a “debt collector” as the phrase is defined and applied under 15 U.S.C. §1692(a) of the FDCPA in that they regularly attempt to collect on debts primarily incurred for personal, family or household purposes.

FACTUAL STATEMENT

6. On a date better known to Defendant, Plaintiff allegedly incurred a debt with Citibank, for use of a credit card utilized for personal or household debts.
7. The alleged debt was then sold to MCM for collections.
8. In an attempt to collect the debt, Defendant sent a letter to a third party named Ali Meahrez. The letter advised Mr. Meahrez that Plaintiff had incurred a debt and an amount was due and owing from Mr. Saad.
9. Mr. Meahrez is not Plaintiff’s attorney, creditor, or a consumer reporting agency.
10. In doing so, Defendant disclosed Plaintiff’s personal information to a third party in violation of the FDCPA, including the fact that Plaintiff owed a debt.

COUNT I **VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT** **15 U.S.C. § 1692 et seq.**

11. Plaintiff repeats, re-alleges, and re-asserts the allegations contained in the above paragraphs and incorporates them as if specifically set forth at length herein.
12. Defendant’s actions are in violation of 15 U.S.C. § 1692c(b).
13. Plaintiff has suffered embarrassment by the improper disclosure of this alleged debt to a third party.

WHEREFORE, Plaintiff, Mohamed Saad, respectfully requests that this Court do the following for the benefit of Plaintiff:

- A. Enter judgment against Defendant for statutory and actual damages pursuant to the FDCPA;
- B. Award costs and reasonable attorneys' fees;
- C. Grant such other and further relief as may be just and proper.

JURY TRIAL DEMAND

Plaintiff demands a jury trial on all issues so triable.

Dated this 13th day of August, 2021

Respectfully Submitted,

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